

5531 Devonshire Avenue
Saint Louis, MO 63109
July 5, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

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Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To Whom It May Concern:

Please continue your current labeling of irradiated foods. As an American citizen, I have always been proud of my freedom to make choices for my life. Having access to information broadens this freedom. Labeling greatly helps us exercise our freedom of choice. You have expressed concern about "inappropriate" reactions to the words "irradiation" or "irradiated." I view labeling with these words as the most clear and concise way to communicate this information. For example, cooking food does decrease its vitamin content. Likewise, irradiating foods such as fruits and vegetables decreases their vitamin content as well. Since I enjoy getting my vitamins and minerals from the foods I eat, I feel labeling of irradiated foods is essential for me to know the nutrient quality of the food I eat. At the very least, I would want to take vitamins if I eat irradiated food to offset possible nutrient loss from irradiation.

In the past, I have applauded the FDA's ability to get information to the consumer. I enjoy knowing the protein, fat and carbohydrate content of packaged foods, for example. A simple thing such as milk being labeled "pasteurized" gives me information about milk I consume. Please continue this opening of information to the consumer. Let us know about the foods we eat. This information should include labeling irradiated foods. I also believe that a date of irradiation should be provided as this gives additional useful information.

Below is the wording of a letter from the Campaign for Food Safety. I urge you to carefully consider the points raised and continue to label irradiated foods. **Have a little faith in consumers and let us make decisions for ourselves. We want to be able to choose.** Thank you.

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.


Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested. Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

98N 1038

Sincerely

Beth H. Haase

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